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ABSTRACT

This document sets out for consultation proposals for a revised method for quality assurance of teaching and learning in higher education. The proposals cover: (1) the objectives and principles of quality assurance; (2) an approach to quality assurance based on external audit principles; (3) the collection and publication of information; (4) reporting and followup; and (5) implementation. The document is being sent for consultation and comment to all higher education institutions and further education institutions funded by the Higher Education Funding Council for England. The proposed approach is analogous to the external financial audit of organizations with well-developed internal audit systems. The presumption is that each institution will monitor its own quality and standards through internal procedures; the external element will "audit," on a selective basis, the robustness and effectiveness of the internal framework. Responses are invited. An attachment lists task group terms of reference. (SLD)

ED 455 725
July 01/45 Consultation

Respond by 26 October 2001

Quality assurance in higher education

Proposals for consultation

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Quality assurance in higher education

Proposals for consultation

To	Heads of HEFCE-funded higher education institutions in England Heads of HEFCE-funded further education colleges in England
Of interest to those responsible for	Quality assurance
Reference	01/45
Publication date	July 2001
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Executive summary

Purpose

1. This document sets out for consultation proposals for a revised method for quality assurance of teaching and learning in higher education.

Key points

2. The proposals build on recent discussions about future methods for quality assurance. They cover:

- the objectives and principles of quality assurance
- an approach to quality assurance based on external audit principles
- the collection and publication of information
- reporting and follow-up
- implementation.

3. This document is being sent for consultation to all higher education institutions and HEFCE-funded further education

colleges, and a wide range of other interested parties, in England. It is also being distributed for information to all higher education institutions in Scotland, Wales and Northern Ireland, where separate discussions about future arrangements are in train.

Action required

4. Comments should be sent by Friday 26 October 2001 to:

Martin Johnson
Quality Assurance Agency
Southgate House
Southgate Street
Gloucester
GL1 1UB.

5. The QAA will circulate all responses to the HEFCE, UUK and SCOP for collective consideration.

Introduction

6. This paper sets out proposals for a further evolution in the approach to quality assurance in higher education. It has been jointly prepared by the HEFCE, UUK, SCOP and the QAA.[1] It is being published for consultation with the higher education sector and other interested parties in England. The QAA plans to issue for consultation in due course a more detailed statement on the implementation of the principles and approach set out in this paper. The HEFCE, UUK, SCOP and the QAA intend to work in partnership to implement the proposed approach.

Objectives

7. The objectives of quality assurance of teaching and learning in higher education are:

a. To contribute, in conjunction with other mechanisms, to the promotion of high quality and standards in teaching and learning.

b. To provide students, employers and others with reliable and consistent information about quality and standards at each higher education institution (HEI).

c. To ensure that HE programmes are identified where quality or standards are unsatisfactory, as a basis for ensuring rapid action to improve them.

d. To provide one means of securing accountability for the use of public funds received by HEIs.

8. These objectives are secured primarily through the internal quality assurance procedures operated by each HEI. The purpose of external review is to validate the reliability and effectiveness of those internal procedures, without duplicating or distorting them. One major consequence of the teaching quality review programme which has operated over the past eight years in England has been to encourage and demonstrate robust and comprehensive internal arrangements in HEIs for setting, monitoring and enhancing quality and standards in teaching and learning. As a result, it is no longer necessary to maintain comprehensive external review at subject level.

Principles

9. The approach which we now propose builds on principles established in recent discussions between the HEFCE, UUK, SCOP and the QAA about the operation of future quality assurance arrangements, namely:

a. Meeting public information needs, so that stakeholders – and above all, students – have information which is up-to-date, consistent and reliable about the quality and standards of teaching and learning at different HEIs and in different subjects.

b. Recognising the primary responsibility of each HEI to operate robust internal mechanisms for setting, maintaining and reviewing quality and standards; for generating information about its quality and standards; and for publishing the key parts of that information.

c. Lightness of touch, so that the burden on HEIs is reduced to the minimum consistent with proper accountability and meeting information needs, and so that the greatest value is secured from the resources used.

10. The main characteristics of the proposed method are that it would:

a. Develop institution-level review, conducted on audit principles, as the basis of external review. Through that mechanism the HEI demonstrates the reliability and effectiveness both of its internal quality assurance arrangements and of the information which it generates.

b. Carry out only on a highly selective basis detailed external reviews at the level of the subject area or theme, rather than continuing to review externally all subject areas on a comprehensive basis. This is a primary means for securing lightness of touch.

c. Vary the intensity of external review on the principle of 'intervention in inverse proportion to success', selecting subject areas or themes for more detailed review on a purposive basis, focused on programmes and institutions where there may be grounds for concern about quality and standards.

[1] The Higher Education Funding Council for England, Universities UK, the Standing Conference of Principals, and the Quality Assurance Agency for Higher Education.

d. Review not only the institutional mechanisms and procedures for securing quality and standards, but also the outcomes delivered in practice – that is, the quality and standards actually experienced and achieved by students.

e. Use the information collected to contribute, in partnership with others, to enhancing quality and standards across higher education.

11. The proposed method would operate within the framework being established by the QAA of standards benchmarks in each subject area, the qualifications framework, the various sections of the QAA code of practice, and the programme specifications. Between them, those provide common points of reference for institutions as they assure the quality and standards of their programmes and awards. They act also as common points of reference for reviews – not as prescriptive blueprints which must be adopted, but as expectations that will be met in different ways to reflect the differing needs, traditions, cultures and decision-making processes of individual institutions. The elements of that framework will be reviewed from time to time to maintain their currency.

The external audit model

12. The proposed approach is analogous to external financial audit of organisations with well-developed internal audit systems. The presumption is that every HEI approves, monitors and reviews its quality and standards through internal procedures. The external element then 'audits', on a highly selective basis, the robustness and effectiveness of that internal framework.

Information about quality and standards

13. The approach starts by testing the availability within the HEI of information relating to quality and standards of teaching and learning. A task group will be set up, representing the organisations concerned and the users of information, to identify the categories of data, information and judgements which should be available, and on what definitions. Proposed terms of reference for the task group are at Annex A. Professor Ron Cooke, Vice-Chancellor of the University of York, will chair the group.

14. The intention would be to draw wherever possible on existing information which HEIs already collect for their own purposes, to avoid this becoming a burden in itself. There will be no requirement for the type of 'baseroom' which features in the old subject review method – that is, a requirement for HEIs to bring together, all in one place and all at one time, all the information specified. Rather, the purpose is to establish that the information is prepared by, or available to, relevant members of staff within the institution when they need it for the purpose of internal quality assurance. That will provide a basis for publication of a standard range of key quantitative and qualitative information. Overall, we believe that this approach will increase the range and richness of up-to-date information available to students and others about quality and standards.

15. It will be for the task group to recommend what the information set should be, both the full set available internally and the sub-set for publication. But for illustration, the internal set might include categories such as:

a. Data on student recruitment, progression and employment, drawing on national performance indicators and associated benchmarks, disaggregated where possible to department/faculty level, and including consideration of widening participation and equal opportunities.

b. Student feedback information about students' experience of the institution and programme.

c. Programme specifications for each programme, including modular schemes, drawn up in the light of the QAA's guidelines.

d. Summary results of internal approval and review processes for each programme, and the results of any internal departmental reviews. These might outline the review method, its main findings, and the action being taken in response. The presumption is that the internal review reports would not be published in full.

Typically, HEIs carry out major internal reviews of their programmes every five years, with annual review of key indicators. The robustness of those reviews can be enhanced where the institution chooses to involve external contributors.

e. Summary results of external examiners' reports. Again, there is no expectation that reports would be published in full. But the way in which an HEI uses its external examiners, and responds to the issues they raise, is a key element in setting and reviewing standards, so one option might be to publish a summary of main points raised and action taken. Many HEIs already produce such summaries for internal purposes.

f. A summary of how the institution promotes high quality teaching (for example through staff mentoring and teaching observation), and progress in implementing its learning and teaching strategy.

g. The results of accreditation reviews by professional and statutory bodies (PSBs), including OfSTED reports on teacher training. It will remain for each PSB to determine whether its reports are published or confidential to the institution.

h. The results of previous QAA institution-wide reviews (with a time limit cut-off to ensure that the information is still reasonably up to date).

i. The results of previous QAA subject-level reviews (again, with a time limit).

16. The task group would recommend what sub-set of this range of internal information should be published by all HEIs, in what format and with what regularity. This published sub-set would be the primary resource for students, employers and others to get up-to-date, consistent information about quality and standards.

Institution-level audit

17. The proposed approach entails substantial revision of the institutional review method, replacing earlier forms of institutional audit or review used by the Higher Education Quality Council and the QAA. The QAA would arrange a programme of institution-level audits with the following characteristics.

18. They would be conducted on peer review principles, by teams of appropriate experience and standing.

19. All HEIs would be audited on a regular cycle. Each would prepare a self-evaluation as the first step in the audit process. This would include, among other things, drawing on and analysing the information on quality and standards recommended by the task group.

20. Consistent with standard audit principles, the purpose would be to gain assurance, on the basis of the minimum necessary scrutiny, as to:

a. The robustness and reliability of the institution's own internal quality assurance methods.

b. The quality of its teaching programmes and the standards of its awards.

c. The reliability of the information assembled under paragraph 15 and published under paragraph 16.

21. Institutions determine their own internal methods for setting, enhancing and reviewing quality and standards. The purpose of the audit is not to prescribe and seek compliance with a particular method, but to assess the robustness and effectiveness of each institution's own approach in meeting certain principles and delivering certain outcomes.

22. The audit would review the assurance that can be obtained both about the institution's processes and about the quality and standards outcomes they generate. There is no intention that institution-level audit would directly seek evidence on outcomes

through observation of teaching or looking at students' work. The responsibility for providing reliable information about outcomes remains with the institution. But much of the information which the audit would consider relates to student outcomes, and to the institution's own methods for securing high teaching quality (for example through teaching observation programmes).

23. The audit team would review the documentation provided by the HEI; and would visit the HEI, raising any questions or areas of concern during the visit. They would expect to interview staff and students, and to seek to follow through examples of the various processes in use at the institution to verify their practical outcomes.

Audit 'trails' as part of institution audit

24. The previous approach to quality assurance in higher education has drawn a sharp distinction between review at the institution level and review at the more detailed subject level. We believe that distinction is unhelpful. For the future, we need to be clear about the purposes of any review activity below the level of the whole institution, so that that activity is kept to the minimum required to achieve the purposes.

25. One purpose of such activity is to inform and verify the findings of the institution-level activity by analogy with an audit trail. The principle of such audit trails is well established from the previous institution audit method. 'Drilling down' to the point of delivery, so as to examine in more detail a small selection of subject areas or themes is an important way of deriving evidence for, and increasing the reliability of, the conclusions formed during the audit review. It is a routine element of any audit approach, and should be fully integrated with the institution-wide review process.

26. As part of the initial discussion between the QAA and each HEI about the timing and handling of its institution review, a small number of subject areas or themes would be identified for more detailed review. The QAA would aim to secure that a balance of provision was examined, across the whole sector, in each of the full range of 42 subject areas during a full five year review cycle.

27. These reviews of relevant individual departments or programmes would be conducted by subject specialists, as part of an expanded audit team, composed on established peer review principles. Their role would be to drill down to test, in the chosen area, how well the institution's internal quality assurance processes were working, the reliability of the information being provided, and the outcomes being delivered. This would be an important source of evidence for the audit team, to inform and contribute to their findings.

28. The number of areas which would need to be reviewed would be very small. Our planning assumption is that areas (by subject, theme, department or programme) accounting for a maximum of 10 per cent of the HEI's students would be sufficient. The results would form an integral part of the institution's audit, and would be published as part of the audit report. So long as no areas of significant weakness in quality and standards were identified, that would complete the external review activity for the HEI. There would be no separate programme of subject-level review.

Subsequent review at subject or theme level

29. Following completion of the institution audit, any subsequent review activity would serve two purposes:

a. To follow up areas of concern or weakness identified at the institution audit stage.

b. To meet accreditation requirements of professional and statutory bodies in relation to programmes which prepare students to practise a particular vocation.

Areas of concern

30. A major purpose of the institution-wide review is to identify whether, and if so where, there may be areas of concern where quality or standards might be at risk. The concerns might relate to a subject area, a faculty or department, or a theme (for example, institution-wide weaknesses in student assessment or student progression). Part of the audit team's findings would identify such areas of concern, as a basis for a programme of subsequent review to follow up the concerns in more detail.

31. The criteria on which judgements were made about the size and construction of that subsequent review programme would flow from the information in paragraph 15. If, for example, the programmes in a subject area had high drop-out rates relative to benchmark, poor student feedback ratings, and concerns raised in some combination of self-evaluations, external examiners' reports, reviews by PSBs or previous subject review reports, then that subject area would be included in the review programme. Where the institution's internal quality assurance mechanisms were found to be unreliable and the track record weak, a high proportion of subject areas might need to be separately reviewed.

32. The size and structure of the follow-up programme, if any, would be discussed between the HEI and the QAA, involving the members of the audit team. The QAA would decide the programme on the basis of the audit team's conclusions, but having regard also to:

a. The need to secure consistency across the higher education sector in the way decisions are made, using clear criteria.

b. The QAA's financial resources under its contract with the HEFCE, and the consequences for the aggregate review activity across the sector that can be afforded each year.

c. The level and scope of review activity by professional and statutory bodies at the institution concerned.

Accreditation by professional and statutory bodies

33. It is assumed that accreditation reviews by PSBs would continue on the same basis as now. Their primary aim is to review how well relevant vocational programmes prepare students for professional practice. Likewise, it is assumed that reviews undertaken in England on behalf of funding bodies other than the HEFCE would continue, such as those to be undertaken by the QAA on behalf of the Department of Health and those undertaken by OfSTED on behalf of the Teacher Training Agency.

34. It will be for each PSB to determine, in consultation with HEIs and the QAA, whether it undertakes such reviews separately from the arrangements covered by this paper, or as reviews undertaken jointly with the QAA. Opportunities for collaborative arrangements between individual PSBs and the QAA will continue to be explored and encouraged. Where such reviews are conducted in accordance with the QAA method, they could form part of – rather than being undertaken in addition to – other separate reviews.

Contributing to quality enhancement

35. One purpose of quality assurance is to contribute to identifying areas of excellence and innovation from which others can learn. It is by no means the only mechanism for promoting this wider enhancement. The Learning and Teaching Support Network (LTSN) subject centres, the LTSN Generic Centre, and the Institute for Learning and Teaching (ILT) have important roles in enabling each subject community to share good practice and innovation. The continuing development of the wider framework in paragraph 11 will also be a key means of reflecting evolving good practice.

36. Through institution-wide audits, including their audit trail reviews at subject or theme level, the QAA review teams will collect evidence about developing practice in teaching and learning. That evidence should be used to prepare, in collaboration with the LTSN and individual subject centres, periodic overview reports, at institution level (along the lines of the reports previously produced by the Higher Education Quality Council), or by subject area or theme. That will not add to the burden of external review for institutions, since it will not require a separate review programme. But it will ensure that the information gained is exploited to best effect.

37. Transfer of good and innovative practice from one HEI to another is rarely, if ever, a matter of simple description and imitation. We therefore see an important role for the LTSN and subject communities in securing understanding of the principles which have generated the practice, and applying them successfully in different contexts – in both different institutions and different subject areas.

38. Where practice in an individual HEI was described in an overview report, our presumption is that it would not be attributed to named participating HEIs. Instead, the report would simply list those institutions it covered. This would avoid the current problem of institutions devoting excessive time and resources to assembling evidence of exemplary practice, because it would be clear from the outset that only a sample of HEIs was being covered.

Length of review cycle

39. We propose that the first cycle of institution audits should take place over a three year programme, and then move to a five year programme in steady state. The reason for the shorter initial cycle is that the institution-level audit is the vehicle through which decisions are taken about the selective programme of reviews to follow up any areas of concern. It would not be acceptable for those HEIs whose audit is scheduled to take place at the end of the institution audit programme to have no external review activity for as long as five years.

40. Our presumption is that those HEIs which have recently had a continuation audit undertaken by the QAA would come at the end of the initial three year cycle of the new institution audit programme. We also expect that the new institution audits would take full account of evidence collected and conclusions reached in recent continuation audits.

Reporting and follow-up

41. We propose the following approach to reporting.

42. All HEIs would be required to publish, from the commencement of the new approach, the information about quality and standards recommended by the task force (see paragraphs 15 and 16). Much of that information would be annual, although some (such as the summary results of major internal reviews) would be on a longer cycle. The audit approach assumes that each HEI can and should be the primary source of reliable, consistent and comprehensive information about its own quality and standards. Overall, there would be a richer range of information available than now.

43. All institution-wide audits would result in a published report prepared by the audit team. That report would identify the characteristics, strengths and weaknesses of the institution's internal quality assurance methods and the quality and standards achieved in practice, including the findings from the more detailed audit trail reviews at subject or theme level. Each report would include a statement of the confidence that can be placed on the HEI's safeguarding of quality and standards, and on the reliability of the information published by the institution.

44. The conclusions of any follow-up reviews of subjects or themes would be reported back by the review team to the HEI in the first instance, using the reporting format already defined.[2] The HEI would be given an opportunity, as now, to correct any errors of fact. It would also be invited to prepare a statement of the action being taken to address any weaknesses identified. Both the review team report and the HEI's response would then be published together. The effectiveness of the action taken by the HEI would be specifically reviewed at the next institution-wide audit, and a conclusion about that would be included in that audit report. This would put the emphasis on whether the institution is acting to secure improvement.

45. It will be important that the procedures should continue to identify, and tackle robustly, any cases of failing and seriously weak provision. We envisage that, as now, failing provision would be revisited by the QAA within a year and, if found still to be failing, the HEFCE would withdraw funding. Where serious weaknesses were identified, those too should be the subject of follow-up action by the QAA, as applies now when the agency requires an improvement plan for subject areas assigned three or more ratings of 2 on the six standard aspects.[3]

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[2] The reporting format distinguishes between provision which is 'failing', 'approved' or 'commended'.

[3] The numbering refers to the current reporting system at subject level. Each review looks at six standard aspects of quality; and each aspect is assigned a rating on a scale of 1 to 4 where 1 means 'failing' and 4 indicates that the programmes are fully meeting the providers' objectives.

Implementation

46. The approach proposed in this paper is an evolution of the new quality review method developed in recent discussions. Since we believe that the objectives and principles in paragraphs 7 and 9 are widely agreed, much of the method devised by the QAA can apply as previously envisaged. But there are new features which need detailed working through. It is essential that the HE sector and other parties should be consulted on, should be involved in, should understand, and should agree with the method of implementation.

47. The current review programme at subject level in England will be completed in December 2001. It would be sensible to use the period January to September 2002 as a time for discussion and preparation, with the new method being implemented for HEIs from September 2002.

48. The new approach to institutional audit proposed in this paper will require preparation of a new section of the QAA reviewers' handbook, consultation, and training for reviewers, prior to implementation. It will not therefore be feasible to commence the new institutional audit process in England before autumn 2002.

49. For those HEIs whose institution-level audit is scheduled for the second or third year of the initial three year cycle, we propose a highly selective subject-level review programme for the interim period September 2002 to July 2004. That would cover:

a. Subject areas not previously reviewed (notably accountancy) and new programmes.

b. Subject areas in HEIs which, under the review method applying prior to 1995, were not visited but self-assessed as satisfactory by the institution, or which were assessed as unsatisfactory.

c. Subject areas in HEIs which were identified as failing or requiring substantial improvement in the post-1995 review programme.

50. The results of such reviews would be fed back to the HEI, and the effectiveness of the institution's response would then be specifically considered, and reported on, as part of its institution-wide audit.

51. In terms of the overall volume of activity resulting from this approach, subject-level or thematic reviews would be very substantially reduced from the current level of activity devoted to teaching quality review. The announcement by the Secretary of State in March 2001 envisaged a reduction of 40 per cent in the volume of subject-level activity. Given effective institution-wide review, and a purposive approach to follow-up reviews targeted on areas of concern, we believe a greater reduction sector-wide can now be achieved of at least 50 per cent.

52. The activity which does take place will be very selectively distributed between HEIs. It will depend particularly on:

a. The confidence derived from the institution-wide audit, including the more detailed audit trail reviews by subject or theme. Where no grounds for concern are identified, no further external review will be needed. But where there are pervasive and serious grounds for concern, a high proportion of subject areas may need to be reviewed.

b. The proportion of the HEI's work which is subject to PSB accreditation carried out using QAA review methods.

53. Further education colleges which provide HEFCE-funded HE courses will not be covered by the institution-level audit programme. Their equivalent institution-wide review is conducted by OfSTED and the Adult Learning Inspectorate (ALI) on behalf of the Learning and Skills Council. HE programmes in FE colleges will therefore be reviewed using the subject review method described in the Handbook for Academic Review published by the QAA in April 2000. It is for consideration how far the QAA could draw on information obtained by OfSTED/ALI in order to co-ordinate, and minimise, the burden on colleges.

54. These arrangements apply to HEFCE-funded provision in England. The intention of all the parties is to retain a UK-wide framework so far as possible. But it is for other funding bodies to consider with their HEIs whether they wish to adopt the approach described.

Invitation to respond and next steps

55. We would welcome responses to this paper. It would be helpful if they could be structured to address:

- the objectives and principles of quality assurance (paragraphs 7-11)
- the audit model (paragraph 12)
- the collection and publication of information (paragraphs 13-16)
- the approach to institution-level audit (paragraphs 17-28)
- the objectives of, and approach to, selective reviews of subjects or themes (paragraphs 29-34)
- quality enhancement (paragraphs 35-38)
- the approach to reporting and follow-up (paragraphs 41-45)
- implementation and planning assumptions about the volume of activity (paragraphs 46-54).

56. Responses should be sent by Friday 26 October 2001 to:

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57. The QAA will circulate all responses to the HEFCE, UUK and SCOP for collective consideration. The QAA will issue in due course, also for consultation and in the light of responses to this paper, a more detailed statement of the proposed approach to implementing the proposed framework.

58. We will establish in September the task group to identify what information on quality and standards should be generated in HEIs, and the sub-set for publication (paragraphs 15 and 16).

Annex A

Task group terms of reference

1. The task group is asked to review, and prepare a report setting out recommendations on, the following:

a. The information about the quality and standards of teaching and learning which all higher education institutions (HEIs) should be expected, as a matter of standard good practice, to collect and have available within the institution for the purposes of setting, developing and monitoring quality and standards.

b. Which elements of that information should be published by all HEIs.

c. What definitions should apply to secure consistency between institutions in assembling the information at sub-paragraphs a and b.

d. What formats should apply in publishing the information at sub-paragraph b.

e. The frequency of publication.

2. 'Information' includes data, performance indicators, reports and judgements, in whatever combination the task group judges appropriate.

3. In preparing its recommendations, the task group should have particular regard to the importance of avoiding unnecessary burdens on HEIs in relation to the collection, analysis and publication of information; while still securing that sufficient information is published in a consistent, accessible and robust form, to meet the needs of students, employers and other stakeholders.

4. The task group should aim to complete its work by the end of December 2001. In order to secure understanding and endorsement of its proposals, it may wish to consider publishing interim proposals for consultation. The final report should be submitted jointly to the HEFCE, Universities UK, SCOP and the QAA, who will together consider its recommendations.

5. In carrying out its work, the task group should keep in close touch with discussions which the QAA will be leading to work out in detail the implementation of the proposed approach to institution-wide audit.

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